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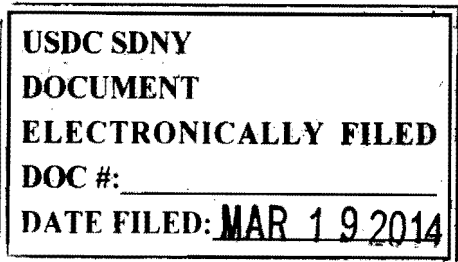
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Office Manager

March 19, 2014

BY ELECTRONIC MAIL

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007



Re: *United States v. Ross Ulbricht*
14 Cr. 68 (KBF)

Dear Judge Forrest:

This letter is submitted on behalf of defendant Ross Ulbricht, whom I represent in the above-entitled case, regarding the Defendant's Pre-Trial Motions challenging the face of the Indictment, which are currently due this Thursday, March 20, 2014. For the reasons set forth below, it is respectfully requested that the Court grant an additional eight-day extension until Friday, March 28, 2014, for the filing of the Defendant's Pre-Trial Motions. Assistant United States Attorney Serrin Turner has informed me that the government consents to this request as long as a corresponding extension, until April 18, 2014, is provided for the government.

The requested extension for the filing of the Defendant's Pre-Trial Motions is necessary because of the following filing obligations (for which I have assumed primary responsibility) in preparing for trial in *United States v. Mostafa*, 04 Cr. 356 (KBF):

- we must submit our "joint" Requests to Charge by this Friday, February 21, 2014, and expect to receive the government's Requests to Charge imminently;
- we must prepare *Daubert* and *in limine* motions regarding government experts, including two additional experts disclosed to the defense yesterday. The expert report for the government's principal expert was provided yesterday; and

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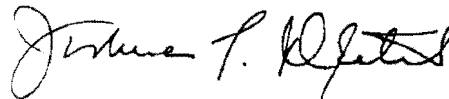
Hon. Katherine B. Forrest
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- we must prepare our supplemental submission regarding the pending Rule 15 motion (including the name of any expert witness we might retain on the issue of demeanor, which is due by next Tuesday, March 25, 2014, and which my associate, Lindsay A. Lewis, Esq., who is working with me on the Ulbricht case, is tasked with resolving).

Also, we are contributing to the general defense responsibilities with respect to the filing of the Joint Pre-Trial Order, stipulations, and our Objections to the Government's Witness List, all due this Friday, March 21st, as well as the filing of the Final Exhibit List, due next Wednesday, March 26th.

Accordingly, it is respectfully requested that the court approve the revised motion schedule set forth above, including an adjustment of the schedule for the filing of the Defendant's reply. As noted, the government consents to this application.

Respectfully submitted,



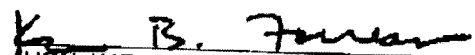
Joshua L. Dratel

JLD/lal

cc: Serrin Turner
Assistant United States Attorney

Application GRANTED
SO Ordered

MAR 19 2014


HON. KATHERINE B. FORREST
UNITED STATES DISTRICT JUDGE